Declaration of Ann N. Sagerson, Esq.

- 1. I am an attorney for Western Services Corporation and George Utmel (collectively, "Western"), and submit the following declaration based upon my personal knowledge.
- 2. The documents listed in the "Documents Reviewed" section of the Report of Richard D. Clark, CPA, MBA have been produced by Western in this litigation and have been designated as "Confidential" pursuant to Paragraph 2 of the Protective Order of Confidentiality entered on June 4, 2003.
- 3. Western's counsel has not received any written objection by plaintiff
 Russian Research Center, The Kurchatov Institute or by third-party defendant GSE
 Systems, Inc. regarding the designation of any of these documents.¹

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 8, 2003.

Ann N. Sagerson

¹ Counsel for Kurchatov objected to the confidentiality designation of a group of documents on October 22, 2003, which counsel maintained were blank documents. Upon review, Western's counsel agreed that the blank documents should not have been marked confidential, but noted that one of the documents was a financial spreadsheet and that Western maintained its confidential designation as to that document. Kurchatov made no further objections as to the confidential designation of that document.